

THE
**CONSOLIDATED
SUBMISSION**
FOR
**COMMUNITY
PLANNING AND
DEVELOPMENT PROGRAMS**
ACTION PLAN

FOR
FISCAL YEAR 2005
(January 1 through December 31, 2005)

City of Council Bluffs, Iowa
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THOMAS P. HANAFAN, MAYOR

OCTOBER 28, 2004

PREPARED BY THE COMMUNITY DEVELOPMENT DEPARTMENT

CITY OF COUNCIL BLUFFS ACTION PLAN FOR FISCAL YEAR 2005

The Annual Action Plan is that part of the Consolidated Plan which describes the various resources expected to be available and the activities the City will undertake during Fiscal Year 2005 to address the priority needs and local objectives identified in the strategic plan. In addition, the Action Plan serves as an application for federal funds under U.S. Department of Housing and Urban Development (HUD) formula grant programs.

The formula grant programs covered by this Action Plan include only the Community Development Block Grant (CDBG). The Home Investment Partnership (HOME) and American Dream Downpayment Initiative (ADDI) Program funding and activities are outlined in the City of Omaha Annual Action Plan. The goals of the formula grant programs covered by the Action Plan are: 1) to strengthen partnerships among all levels of government and the private sector so as to enable them to provide decent housing; 2) to establish and maintain a suitable living environment and 3) to expand economic opportunities for low and moderate income residents.

Anticipated Federal and Other Resources

The following are estimates of funds expected to be available during 2005 for use in carrying out the City's affordable housing, economic and community development programs and activities:

<u>Federal Resources</u>	<u>Amount</u>
FY 2005 CDBG Entitlement	\$1,294,000
FY 2004 CDBG Entitlement Carryover	\$150,000
FY 2005 CDBG Program Income	\$220,000

Total Estimated Federal Resources	\$1,664,000
 <u>Other State and Local Resources</u>	
Other Public Funds	\$816,412

Total Estimated Other Resources	\$816,412
 <u>Private Sources</u>	
Estimated Private Sources	\$1,899,871

Total Estimated Funds from All Sources	\$4,380,283

Leverage/Matching Funds

In order to achieve the goals of the Consolidated Plan, other entities must apply for federal funds for which the City is not itself eligible. The sources of “other” federal funds include, but are not limited to: 1) Public Housing Comprehensive Grant, Section 8 Assisted Housing and related Programs; 2) Federal Emergency Management Agency Programs; 3) Community Services Block Grant Programs; 4) the Section 202 Elderly Housing Program; 5) the Section 811 Supportive Housing Program; 6) the Continuum of Care Super NOFA Supportive Housing Fund Program; 7) the Supplemental Assistance for Facilities to Assist the Homeless Program; 8) Federal Home Loan Bank Affordable Housing Program; 9) the Housing Counseling Program and 10) the Shelter Plus Care Program.

State of Iowa resources available for local investment include: 1) Iowa Finance Authority Low Income Housing Tax Credit and Tax Exempt Bond Programs; 2) Iowa Finance Authority Housing Assistance Program (HAP); 3) Iowa Department of Economic Development Emergency Shelter Grant Program (ESG) and Homeless Shelter Operations Grant Program (HSOG); 4) the Iowa Department of Human Services Subsidized Childcare Program and 5) State HOME Investment Partnership Program.

Private resources include the, the United Way of the Midlands, Iowa West Foundation, other foundation grants and corporate contributions.

The City’s Community Development Department is knowledgeable about local, state and federal resources for affordable and supportive housing and has experience in working with local entities in securing such resources. The City will assist eligible agencies in identifying resources and will aid appropriate organizations in preparing applications to public and private agencies for financial assistance. If necessary, the City will recruit eligible agencies to apply for programs which will help achieve the goals of the Consolidated Plan.

Funds leveraged for affordable housing programs will be met primarily by the subrecipient organizations receiving the funds. Entities applying for funds for which the City is not itself eligible will provide required matching funds from their own resources. In some cases local or state government funds may assist the project, but in the majority of the cases the subrecipient will meet the matching requirements of the program with its own funds or with private funds. CDBG funds will be leveraged with private dollars secured from private and nonprofit sources.

The City typically has been successful in leveraging federal funds with private dollars in its housing and community development programs. Primary sources of leveraged funds are private financing and private equity contributions. In some instances, foundation grants are leveraged with federal funds. The success the City has achieved in leveraging private funds has been sustained through the design of programs, the method of selecting projects and the recipients of funds, and the City’s monitoring of programs.

Geographic Distribution of Assistance

Geographically, the Neighborhood Revitalization Strategy Area (NRSA), the City's central portion, has the greatest housing and service problems. The NRSA is a contiguous area of about four square miles located in the central portion of Council Bluffs and contains the city's Central Business District, the Broadway Commercial Corridor, railroad related industrial uses and a variety of single family residential neighborhoods. A map of the NRSA is on the following page. Based on the 2000 Census figures, 9,902 persons, or 64.4% of the NRSA, are classified as low or moderate income, compared to a city-wide percentage of 54.1%. Residents of the NRSA have the greatest need for assistance and activities in this area are given priority. Some programs are designated only for use within the NRSA. Activities targeted to this area include construction of new single-family, single-family rehabilitation and repair, homeownership assistance, rental housing development, counseling services and homeless initiatives. However, investments in housing will occur throughout all predominantly low and moderate income areas.

In the areas selected for investment the City hopes to achieve: 1) the conservation of existing neighborhoods and the preservation and expansion of existing housing stock; 2) dramatically visible, concentrated improvement of strategic parts of neighborhoods with greatest economic and housing needs; 3) the expansion of rehabilitation and new construction activity into low income neighborhoods; 4) housing infill development which will make vacant property productive again and 5) creation and retention of jobs for low and moderate income persons.

Statement of Objectives and Proposed Use of Funds for the 2005 Community Development Block Grant Program

Funding Allocation Criteria

The City has established the following funding criteria to ensure that, to the greatest extent feasible, the use of CDBG funds benefit low and moderate income persons.

- The City's proposed allocation of CDBG funds should be consistent with the national objectives of Title I of the Housing and Community Development Act of 1974.
- Approved programs, projects and services shall be directly related to the City's CDBG Program objectives as outlined in the Consolidated Plan.
- CDBG assistance shall not supplant funding from any other pre-existing public or private resource.
- CDBG funds shall be used for administrative and operational costs of subrecipient organizations only when such organizations are under City contract for services meeting program objectives.

The primary objective of the City's Community Development Program is the development of viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. The City must certify to U.S. Department of Housing and Urban Development (HUD) and maintain evidence that the use of CDBG funds gives maximum feasible priority to activities which carry out the national objectives.

This Statement of Objectives establishes the City's community development objectives and sets forth the strategy used to meet the objectives. Our proposed 2005 CDBG Program has four general parts:

1. Housing Development – The conservation and redevelopment of established neighborhoods and the preservation and expansion of their housing stock.
2. Economic Development – The revitalization of commercial properties and job creating projects that benefit low and moderate income people.
3. Public Services and Facilities – The development of physical and human service projects that benefit low and moderate income people by non-profit organizations.
4. Administration – The efficient operation of the Community Development Program.

The specific local objectives of the City's CDBG Program and how they will be addressed are described below.

Part I - Housing Development

The City's housing development efforts will have three main components: single-family rehabilitation, rental rehabilitation and housing development. Single-family rehabilitation projects will address the need to preserve existing single-family, owner-occupied housing and to help low and moderate income people finance home improvements. Rental rehabilitation projects will help finance the removal of architectural barriers in rental housing. Housing development activities will find ways to create affordable rental opportunities and to make home ownership possible for low and moderate income people. Together these programs make up a coordinated strategy for neighborhood improvement and reinvestment.

Single-Family Rehabilitation

The general objectives addressed by the single-family rehabilitation program are:

1. To provide dramatically visible, concentrated improvement in strategic parts of the City with the greatest economic and housing needs.
2. To make affordable rehabilitation financing more available in low and moderate income areas. To expand rehabilitation activities into low and moderate income areas which have seen little or no previous CDBG investment.
3. To continue to use leveraging programs with private sources.
4. To continue to provide special services to people with critical needs, including barrier removal and emergency repairs.
5. To support agencies and programs which are associated with and vital to the success of the Community Development Program.
6. To continue to implement the Lead Based Paint Regulations and to support the reduction of such hazards.

We will meet these objectives in the following ways:

1. Home Improvement Program: This program provides affordable home improvement financing to low and moderate income homeowners for both interior and exterior modifications. The program is implemented on a city wide basis with emphasis on the City's NRSA. The Home Improvement Program will also aim to reduce lead based paint hazards in low and moderate income households. Priority will be given to those families whose children are under the age of 6 or individuals with documented elevated blood levels. The program will directly benefit low and moderate income residents and utilize \$766,000 in CDBG funding.

A new component to the Home Improvement Program introduced for the 2004 program year is the Exterior Rehabilitation Program, which is intended to provide assistance to households located in urban renewal areas or historic landmark districts for exterior home improvements. The program is intended to upgrade existing housing and to provide

immediate visual improvement of residential neighborhoods. The assistance for this component of the Home Improvement Program is not funded with federal dollars and is not limited to low and moderate income residents. However, assistance is available only for those households located in the NRSA.

2. Emergency Repair Program: This continuing program provides grants to very low income homeowners for critical emergency repairs in their homes. This program operates throughout the City, but is targeted toward low-income households (0 to 50% of median family income). Therefore, all funds (\$30,000) will benefit low and moderate-income individuals and families.

Blight Removal

1. NRSA Demolition / Interim Assistance: This effort supports the removal of debris and trash from an area on an interim basis until permanent improvements are made in order to prohibit signs of deterioration. The effort also supports the demolition of vacant, deteriorated housing units or commercial buildings. Both efforts are targeted to those properties located within the NRSA. The removal of debris and trash will occur on a spot basis or in areas where projects are planned. The removal of deteriorated structures will occur on a spot basis or in areas declared blighted and substandard. All activities will aid in the elimination of slum and blighting conditions, which will result in additional neighborhood reinvestment. The City of Council Bluffs will allocate \$13,000 in CDBG funds towards this project.
2. Blighted Program: This program will be administered by the Community Housing Investment Corporation (CHIC) and will involve matching funds from the Iowa West Foundation. This program involves the acquisition, demolition and redevelopment of vacant and blighted properties. Upon completion of demolition, properties are disposed to private investors and developers for the construction of housing. Activities will eliminate slum and blighting influences on a spot or area basis or benefit low and moderate-income persons. The Blighted Program is divided into parts: that resulting in low/mod housing (\$92,500) and that classified as slum and blight removal (\$92,500). \$75,000 in CDBG and \$110,000 in private foundation funds will be utilized for this program.
3. Mid-City Railroad Corridor: This project will involve the acquisition and demolition of properties in the City's Mid-City Railroad Corridor. The Mid-City Railroad Corridor project area is a 36 block area encompassed on the north by Avenue G; on the south by 5th Avenue; on the west by Indian Creek and 13th Street; and on the east by 10th Street. This area was designated as an Urban Renewal Area, as per Chapter 403 of the Code of Iowa by City Council on May 24, 2004. Properties acquired under the program will be held in public trust. However, some properties will be utilized to allow for railroad track consolidation, drainage/flood control and infrastructure improvements, neighborhood redevelopment projects and open space. Activities will eliminate slum and blighting influences on an area basis. CDBG funding will be allocated in the amount of \$100,000 and \$150,000 in private foundation funds.

Rental Rehabilitation

The general objectives addressed by the rental rehabilitation efforts are:

1. To provide sound rental housing for low and moderate income residents.
2. To encourage the reuse of vacant, but repairable multi-family structures.
3. To use CDBG funds to leverage private investment and to make rehabilitation projects economically feasible.
4. To increase the supply of handicap accessible units.

We will meet these objectives in the following way:

1. Barrier Removal Program: This program, administered by the League of Human Dignity, provides grants to low income persons with disabilities to assist them in modifying their residential units for accessibility. The program encourages persons to remain in their existing living environment and creates additional accessible housing in the community. The program is available for rental units and owner-occupied housing. This program operates throughout the City for low and moderate income households (0-80% of median). \$25,000 in CDBG funds have been committed to this program. All funds will benefit low and moderate-income individuals and families.

Housing Development

The general objectives addressed by the housing development efforts are:

1. To expand home ownership opportunities for low and moderate income residents.
2. To conserve and reuse structures that face demolition or continued deterioration.
3. To promote new, moderate cost residential construction for homeowners in community development areas.
4. To convert unproductive land to productive residential use.
5. To encourage more efficient use of existing infrastructure through infill development.
6. To encourage the development of low cost housing for elderly residents.
7. To support agencies and programs which are associated with and vital to the success of the City's community development efforts.
8. To encourage for-profit builders and developers to reinvest in low and moderate income neighborhoods.

We will meet these general objectives in the following ways:

1. Habitat for Humanity: This program builds homes for very low-income families using donated funds, materials and volunteer labor. They sell these homes to families at cost, with no interest and receive repayment through “sweat equity” and monthly cash payments based on the householder’s ability to repay. To qualify, households must have incomes between 30 and 60 percent of the median income. This program is carried out on a community-wide basis. The City of Council Bluffs will provide \$50,000 in CDBG assistance for land acquisition and site development costs and \$190,000 in private funds will be provided to this program.
2. Metro 100: The Metro 100 Program will provide first time homebuyer products and a rehabilitation mortgage loan financing to approved applicants purchasing homes in Council Bluffs. This program will be administered by Omaha 100 and will be targeted to individuals and families below 80% of median income. Metro 100 will assist applicants who otherwise would not qualify for traditional bank financing due to credit issues and/or insufficient savings for downpayment and closing costs. This program will be coordinated with homebuyer seminars and credit and budget counseling provided by Family Housing Advisory Services (FHAS). All funds will benefit low and moderate-income individuals and families. Allocated CDBG funds for this program total \$20,000.
3. NRSA Program: This program provides public infrastructure support for redevelopment projects located within the NRSA. Funds will be targeted to the 23rd Avenue neighborhood redevelopment project. All funds will benefit low and moderate-income individuals and families. The City of Council Bluffs has committed \$50,000 in CDBG and \$150,000 in Capital Improvement Program funds to this project in 2005.

Part II – Economic Development

The City will continue to use CDBG funds to reinforce business development and job creation for low and moderate income people. Economic development builds financial strength in the community and job creation activities help people achieve economic self-sufficiency.

The objectives addressed by the economic development component of the City's community development efforts include:

1. To improve the commercial building stock of the community.
2. To encourage new small business starts and expansion in the Neighborhood Revitalization Strategy Area.
3. To create jobs for low and moderate income people.

We will meet these objectives through the following projects:

Historic Preservation Rehabilitation Program: New for the 2005 program year is the Historic Preservation Rehabilitation Program, which is intended to assist with the establishment of revolving loans and/or grants to be used to aid private owners of historically designated properties in the downtown area with necessary improvements and renovation resulting in reuse of the buildings for commercial and/or mixed use. Properties that are strictly residential in nature would not be eligible for funding. The program is intended to assist in the revitalization and reinvestment of the downtown area, leading to more private sector investment and increasing the number of residential units in downtown. \$300,000 in Economic Development Initiative funds and \$500,000 in private foundation funds are being allocated for this Program.

Part III – Public Services and Facilities

Public services and facilities programs are designed to provide an opportunity for non-profit community organizations to develop and execute projects which benefit low and moderate income residents. The general objectives of this part of the program include:

1. To provide a means by which non-profit organizations can construct physical development projects which will benefit low and moderate income people.
2. To support the human service needs of the community with emphasis on homeless and transitional housing, homeless prevention, youth activities and education, and housing counseling.
3. To improve the quality of improvement projects through competitive applications.
4. To expand emergency services to low income people.

We will accomplish these objectives through the following programs:

Homeless and Transitional Housing

1. MICAH House: A \$45,000 allocation will be provided to the MICAH House Emergency Family Shelter for operational costs for the facility located at 231 South 7th Street. This project will benefit homeless women and families.
2. Catholic Charities: An allocation of \$10,000 will be provided to Catholic Charities for operational costs for the Phoenix House, a domestic violence shelter. The facility is located at a confidential location. This project will benefit women and children that are victims of domestic violence and/or sexual abuse.
3. Inter-Faith Response, Inc.: A \$20,000 allocation will be provided to Inter-Faith Response for homeless prevention activities by assisting near homeless persons with the payment of housing and utility bills to prevent evictions and utility shut-offs. The funds may also be utilized to pay for the first month's rent for a person entering permanent housing from a homeless shelter. This program will benefit primarily very low income persons and families.
4. Red Cross: An allocation will be provided to the Loess Hills Chapter American Red Cross for homeless prevention activities by assisting near homeless persons with the payment of housing and utility bills to prevent evictions and utility shut-offs. The funds may also be utilized to pay for the first month's rent for a person entering permanent housing from a homeless shelter. This program will benefit primarily very low-income persons and families utilizing \$20,000 in CDBG funds.
5. Christian Worship Center: An allocation of CDBG funds will be provided to the Christian Worship Center for the operational costs associated with MOHM's Place, which serves as a feeding site, clothing and food pantry, a wellness clinic and information and referral center.

This project benefits homeless and near homeless persons and families. CDBG funds in the amount of \$13,000 have been committed to this project.

Youth Services

1. Community Education Foundation: An allocation will be provided to the Community Education Foundation for scholarships for the Kids & Company Program. This program provides affordable before and after school care and education to children in the Council Bluffs School District who might otherwise be unsupervised. The program will benefit low and moderate-income families, utilizing \$40,000 in CDBG funds.

Housing Counseling

1. Family Housing Advisory Services (FHAS): An allocation will be provided to FHAS for HomeSearch Counseling, Pre-Purchase Counseling, Foreclosure Prevention Counseling, Fair Housing Services and Mediation Services in the community. Activities will also include homebuyer seminars to be coordinated with the Metro 100 Program and City Infil Program. This project will benefit low and moderate-income persons and families and utilize \$35,000 in CDBG funds.

Part IV – Administration

The program administration component covers a portion of the Community Development Department's cost for program administration and provides financial support to associated agencies and programs. General objectives for program administration include:

1. To assure that the largest possible proportion of Council Bluffs' CDBG entitlement is used for physical development projects.
2. To provide high quality program administration at minimum possible cost.
3. To support agencies and programs which are associated with and vital to the success of the Community Development Program.

We will meet these objectives in the following ways:

Community Development Department: Administrative support for Council Bluffs CDBG Program is provided by the Community Development Department. The Department is also responsible for overall program management, coordination, monitoring and evaluation of community development activities assisted in whole or in part with federal funds, general funds, tax increment financing and other programs. The \$352,000 funding for CDBG program, while a necessary part of the Community Development Program, is not counted as an activity that benefits low and moderate-income people.

Homeless and Other Persons with Special Needs

Homeless

Omaha Area Continuum of Care for the Homeless (OACCH): Through its partnerships, the City of Council Bluffs will continue its participatory and active role in the Omaha Area Continuum of Care for the Homeless (OACCH). OACCH plays a critical part in the funding application processes for Emergency Shelter Grant Funds, State Trust Funds and Supportive Housing Funds whose awarding of funds have become contingent on (among other things) the applicant's active involvement with the Continuum of Care.

Renewed in 2004, a Continuum of Care Super NOFA (a Supportive Housing Fund) application was prepared in 1997 by the Pottawattamie County Homeless Link, made up of four organizations Family Service, MICAH House Emergency Shelter, Legal Services Corporation of Iowa and the Christian Worship Center; who sought to meet identified gaps with the construction of a seven unit transitional housing facility and the provision of outreach and supportive services to the homeless and near homeless. The outreach and supportive services are provided out of MOHM's Place, a meal site for homeless and near homeless persons. Services include: legal services, health care, referral and consultation linking participants to appropriate facilities and services such as: 1) emergency shelters to provide homeless persons with safe alternatives to the streets; 2) service providers and housing opportunities and; 3) transitional housing with supportive services (including job training, job placement, substance abuse treatment, mental health services, and independent living skills). These organizations will continue to seek Supportive Housing Funds.

Future Council Bluffs/Pottawattamie County area proposed projects to be supported by the Continuum include a homeless shelter for men and additional transitional housing facilities as identified in *The Council Bluffs Housing Needs Assessment and Program Development Plan* prepared in December 2000 by independent planning consultants with the assistance of the Council Bluffs Housing Task Force.

Emergency Shelter Grant Program: Emergency Shelter Grant Funds were awarded through the State of Iowa Economic Development Department to five organizations MICAH House, Catholic Charities, Family Service, Family Housing Advisory Services (FHAS) and Christian Worship Center for their activities with homeless and near homeless persons and families. Assistance is provided to these agencies for operations, essential services and homeless prevention activities.

The MICAH House is a 32 bed emergency family shelter receiving assistance with their operations. Catholic Charities – Phoenix House is a shelter facility for victims of domestic violence and sexual abuse and has the capacity for 24 individuals. Catholic Charities receives ESG funds for assistance with operations and homeless prevention. Family Service receives assistance for essential services for their seven unit transitional housing facility. Family Housing Advisory Services receives operations assistance for their housing counseling activities and homeless prevention. FHAS visits the shelters and MOHM's Place weekly to provide their services to the homeless and near homeless population. The Christian Worship Center manages MOHM's Place. MOHM's Place provides, at no-cost, a daily nutritious meal to homeless and near homeless persons and serves as a location where a network of services that span the continuum can be accessed. Such services include food, clothing, medical services, legal

services, mental health services, pastoral services, housing counseling and more. Approximately 41,000 meals are served annually assisting 1500 low and moderate income individuals. ESG funds are utilized for operational costs of the facility and homeless prevention.

Community Development Block Grant Program: In 2005, CDBG funds will assist with operational and staff salaries for the MICAH House Emergency Family Shelter, Catholic Charities – Phoenix House Domestic Abuse Shelter, Christian Worship Center - MOHM's Place meal site and Family Housing Advisory Services housing counseling programs. Also in 2005, CDBG funds will be utilized by the American Red Cross Loess - Hills Chapter and Inter-Faith Response, Inc. for homeless prevention activities. These activities include assistance with rent/mortgage payments to prevent evictions/foreclosures, assistance with utility payments to prevent utility shut-offs and assistance with first months rent for individuals and families coming out of shelters into permanent housing.

Persons with Special Needs

Community Housing Initiatives, Inc., in 2003, was awarded low income housing tax credits from the State of Iowa and HOME funds from the City of Council Bluffs for a 30 unit low income housing project located at 1800 Nash Boulevard in Council Bluffs. The units are targeted for low income working families who are at or below 40-60% of the Median Family Income. In addition, nine of the units are transitional units for families who need specialized assistance. The project opened in the summer of 2004.

In 2003, the City awarded HOME funds to Crossroads of Western Iowa for the construction of a HUD 811 project to be located on Coit Road and North Broadway. The project will consist of 10 one bedroom apartments and 2 two bedroom apartments located within three 4-plex housing units and will be designated for persons with disabilities. Crossroads of Western Iowa will provide supportive services to these persons with disabilities and the project will be designed to meet their special needs. Construction of this project began in 2004.

During 2004, CDBG funds were provided to VODEC, Inc. for interior renovations of their facility located at 612 South Main Street. The renovations were completed in July of 2004. VODEC, Inc. provides vocational and residential services to persons with disabilities.

Future Council Bluffs/Pottawattamie County area proposed housing projects to be supported by the City include the construction of elderly housing and housing for special populations including physically and mentally disabled individuals. Other efforts for the homeless, elderly and frail elderly, persons with disabilities, alcohol and drug addiction and AIDS and related diseases will be addressed through participation in the continuum and continued planning.

Maintaining Affordable Housing

The Consolidated Plan indicated the relative priorities for assistance among: 1) different categories of extremely low, very low and low income households with needs for housing assistance and 2) the activities appropriate for meeting identified needs (in the context of the City's housing market and inventory conditions and the cost of different activities).

The principal features for achieving the objectives of this strategy include:

- Increasing the supply of standard, affordable rental housing through the rehabilitation of existing housing and the construction of new units.
- Promoting home ownership opportunities through the renovation of owner-occupied single-family homes.
- Preserving existing home ownership through the renovation of owner-occupied single-family homes.
- Providing rental assistance to alleviate rental cost burden experienced by very low and low income households.
- Providing affordable housing opportunities designed to meet the needs of the elderly, people with disabilities, large families and other special needs groups.
- Ensuring, at a minimum, a one-for-one replacement of public housing units lost through demolition.
- Addressing the needs of homeless individuals and homeless families through the provision of services and assistance to shelter operators.
- Providing for increased housing choice and opportunity both within and outside of areas of minority and low income concentration.
- Creating economic development activities to help people achieve economic self-sufficiency.
- Providing opportunities for non-profit community organizations to develop and execute projects which benefit lower-income residents.
- Reducing lead-based paint hazards.
- Building increased capacity within the housing delivery system to make the institutional structure more responsive to the needs of low and moderate income persons.
- Implement recommendations contained in the Council Bluffs Affordable Housing Study and *The Council Bluffs Housing Needs Assessment and Program Development Plan* prepared in December 2000.

Removing Barriers to Affordable Housing

During the next year, the City will continue to support efforts aimed at reducing known barriers to fair and affordable housing. Specific activities to be undertaken over the next year include the following:

- Provide funding to FHAS to undertake fair housing and housing counseling services in the community. These activities and others were outlined in the City's Analysis of Impediments to Fair Housing Report.
- Provide funding to continue the Barrier Removal Program for low and moderate income persons and families.
- Continue to implement recommendations outlined in the City's Analysis of Impediments to Fair Housing Report and develop a plan to update this report.
- Continue efforts to identify and provide adequate property, which is properly zoned and served with utilities, for multi-family housing construction.
- Continue to provide relocation assistance to persons displaced by CDBG funded activities through existing policies.
- Support the Municipal Housing Agency, private developers and non-profit organizations in the development of additional affordable housing.
- Undertake and support local efforts which are aimed at educating residents about affordable housing needs and programs in an attempt to change negative attitudes and misconceptions of affordable housing.

Evaluating and Reducing Lead-Based Paint Hazards

- Continue to implement the Lead Base Paint Regulations.
- Continue efforts to conduct contractor training sessions.
- Provide support to CDBG funded activities aimed at reducing lead-based paint hazards.
- Continue to educate staff, including maintaining recertifications as required.

Reducing Poverty

- Pursue the economic development strategies set forth in the Council Bluffs Comprehensive Plan with emphasis on business recruitment and expansion which guarantees a percentage of low and moderate income employees.
- Coordinate all City economic development efforts, regardless of funding sources, with the Iowa Western Community College, Iowa Department of Employment Services, Workforce

Development and other job training programs. Coordination will be accomplished through continued planning and strategy development.

- Support development activities which retain and expand the economic mix of residents within low income areas of the community.
- Support the development of affordable housing projects located outside of low income areas.
- Continue to implement a self-sufficiency program to provide assistance to low income persons participating in rental assistance programs.
- Create incentives and programs to encourage private sector investment in low income areas.
- Provide funding for programs that offer services to increase the overall income of low-income persons.
- Continue to implement the requirements of Section 3 on all CDBG funded projects.

Developing the Institutional Structure

The institutional structure within the City, which will deliver and manage the affordable and supportive housing programs, includes elements from the public and private sectors. The Community Development Department will play the lead role in administering the housing strategy. The Department is responsible for implementing the City's community development and redevelopment activities. The Department's plans and programs must be approved by the Mayor, the City Council and the Community Development Advisory Committee prior to implementation.

Funding from the CDBG Program is the foundation for the diverse programs which assist low and moderate income residents with housing needs. The City will administer its CDBG housing development programs identified in the Action Plan.

The Municipal Housing Agency (MHA) will be responsible for Public Housing and Rental Assistance Programs and activities. The MHA will continue its self-sufficiency programs.

Non-profit organizations will play an increasing role in the City's housing strategy. During the period covered by this strategy, the City will work with the Community Housing Investment Corporation, Family Housing Advisory Services, Community Housing Initiatives, Southwest 8 Senior Services, MICA House, Inter-Faith Response, American Red Cross – Loess Hills Chapter, Christian Worship Center – MOHM's Place, Family Service, Catholic Charities – Phoenix House, Crossroads of Western Iowa, Omaha 100 – Metro 100, Children's Square, Habitat for Humanity, League of Human Dignity and others. The City will continue to strengthen the capacity of these organizations.

Private builders and developers also play a major role in the production of affordable housing in the City. Private builders and developers participating in City-sponsored housing development programs have an understanding of required development standards and are experienced in working with federal regulations. The City will continue to develop and enhance relationships with new contractors and familiarize them with the rules required under both City and federal regulations.

Enhancing Coordination among Public and Private Agencies

The City also intends to provide services and conduct its activities, as efficiently and responsibly as possible. The Community Development Department of the City of Council Bluffs shall be charged with the responsibility for plan implementation and monitoring. Good record keeping and continuous program monitoring will also be conducted to ensure effective use of funds and maximization of program benefits. The City has identified specific activities. These activities will be carried out by in-house staff or subcontracted to subrecipients depending on the type of program and the capabilities of the organizations involved. Monitoring procedures will have components specific to the program or project.

Monitoring of Subrecipients – The City’s project monitoring efforts begin with the negotiation of individual contracts. Contracts must be drafted in such a way as to provide measurable performance criteria and administrative standards, all consistent with HUD or other regulatory guidelines and requirements. Progress towards attainment of specific goals will be monitored throughout the contract term and any longer period specified. This is particularly important for subrecipients who are working under a long term contract for service. Based on the recommendations of an April/May HUD monitoring review, the standard CDBG contract was revised to reflect the Fair Housing Act (570.601(a)(2)) and eligibility restrictions for certain resident aliens (570.613). The contract was also revised to have a more complete statement of work in order to effectively monitor the performance of the subrecipient. Monitoring of subrecipients by City staff will include the combined use of tracking of compliance key terms of the contract, contract specified inventory of required monitoring area, on-site reviews and audits, annual performance reports and periodic status reports as necessary. Violations, deficiencies, or problems identified during routine monitoring procedures will be addressed and corrected by providing the subrecipient with the necessary information and technical assistance. If the problem persists, sanctions will be imposed appropriate to the scale of the problem.

In-House Monitoring – In addition to monitoring the performance of subrecipients, the City has a monitoring system in place for projects and programs conducted by Community Development Department staff. This includes a competitive bidding, job site inspection, eligibility determinations and underwriting criteria and monthly activity reports. Monthly reports allow staff to analyze goal related performance in a number of areas. These include the number of clients benefiting, client composition and geographic areas served. By analyzing at this level, staff can determine when and where needs are being met, area and populations being under served and compliance with regulatory requirements. The City will continue to invest significant staff time and effort to an ongoing and thorough monitoring process to insure that all funds are put to their best and most efficient use according to the priorities and goals identified and within the guidelines of the appropriate state and federal program.

Coordination – The City is committed to working with a variety of citizens and organizations to implement the activities identified by this plan. Existing coordination efforts will be continued to maximize services and programs. In addition to these efforts, the City will focus on several areas. These include: leveraging resources to the greatest extent possible, expanding communication with the private sector in the area of affordable housing development, continually meeting with human service and housing providers to share information, coordinate efforts and address community issues. The City will also participate, and require the participation of other agencies where appropriate, in the Omaha Area Continuum of Care for the Homeless.

Public Housing Improvements

The strategic goals as identified in the Council Bluffs Municipal Housing Agency (MHA) five-year PHA Plan (2005-2010) are as follows:

- Expand the supply of assisted housing by leveraging private or other public funds to create additional housing opportunities;
- Improve the quality of assisted housing by renovating or modernizing public housing units; and
- Ensure equal opportunity and affirmatively further fair housing by undertaking affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

The MHA has not been successful in increasing the availability of affordable housing. However, late in 2003 the MHA successfully established a non-profit sister organization to open the door to additional sources of funding for affordable housing production.

The MHA continues to improve the quality of assisted housing by renovating or modernizing existing public housing units. Specifically in 2005 the MHA at its two elderly projects will perform the following improvements:

Regal Towers – Alter select dwelling units for Section 504 modifications, replace hot water heater, repair west parking lot, make improvements to the sidewalk and site, undertake a rear lobby entrance project and purchase and install community room speaker system and video equipment. The total estimated cost for these projects is \$277,822.

Dudley Court – Perform repairs to select bathroom floors, make improvements to sidewalk and parking, replace kitchen floor and install community room lighting. The total estimated cost for these projects is \$17,000.

The MHA is able to affirmatively further fair housing by maintaining an active relationship with the Pottawattamie County Landlord Association. Through this relationship the MHA is able to promote a better understanding about the benefits of Section 8 participation among persons in the rental housing business.

Public Housing Resident Initiatives

The MHA does not propose any specific resident initiatives for public housing. Currently, the MHA operates two elderly projects and does not own or manage low income family units. As of August 1, 2000, MHA has had a resident on the MHA Board of Directors in accordance with their Resident Board Member Policy. A meeting was held June 30, 2004 with residents of the two elderly projects to solicit comments regarding the PHA Plan for 2005. In general, the residents did not suggest any changes and were satisfied with the plan. However residents asked about specifics regarding some of the MHA's policies concerning tenants and those on the waiting list needing handicap accessible apartments. Other items brought up concerned the stairways in one of the apartment complexes and cosmetic changes to the entry area of this same complex.

The MHA continues to do outreach and marketing efforts to local property owners. This is mainly done by sponsoring a landlord's newsletter and actively participating in the landlord association. The MHA has continued to distribute two pamphlets, "Respect Your Tenant" and "Respect Your Rental Unit." The MHA Section 8 continues to participate with the lead-based paint program to educate and inform tenants and landlords.

Historic Preservation

The City has determined that implementation of its CDBG Program will have an effect upon properties included in or eligible for listing on the National Register of Historic Places. Pursuant to Section 106 of the National Historic Preservation Act, the City will implement its program in conformance with 36 CFR Part 800, "Protection of Historic and Cultural Properties".

All projects proposed to be supported financially by the City's Program will be reviewed in a manner consistent with the requirements contained in 36 CFR Part 800 and the procedures outlined by the document "Iowa State Historic Preservation Office".

The following community development activities have been determined to have no effect on historic properties and their implementation will not require review under 36 CFR Part 800:

1. When the Area of Potential Effect (APE) has been intensively surveyed by a professional within the last 8 years;
2. Projects involving buildings of any type that are less than 50 years; and
3. Projects involving single-family dwellings built after 1930, unless it meets certain conditions.

However, their exclusion does not preclude the City from its responsibilities for the identification of historic properties as described in 36 CFR 800.4.

Community Development activities exempt from review under 36 CFR Part 800 are as follows:

1. Exterior rehabilitation activities described below:
 - a. General maintenance/repair, including: gentle cleaning, scraping and painting;
 - b. In-kind replacement;
 - c. Property weatherization;
 - d. Installation of temporary ramps; and
 - e. Construction of ramps on secondary facades.
2. Interior Rehabilitation activities described below:
 - a. In-kind repair/replacement of asphalt and concrete curbs, sidewalks, driveways and ramps;
 - b. In-kind replacement or installation of site improvements, including landscaping and park equipment;
 - c. Electrical and mechanical systems when no structural alterations are needed;

- d. Repair of interior surfaces, including drywall installation;
 - e. Properly installed insulation; and
 - f. Repair/replacement of cabinets and fixtures.
3. Site improvements described below:
- a. In-kind repair/replacement of asphalt and concrete curbs, sidewalks, driveways and ramps; and
 - b. In-kind replacement or installation of site improvements, including landscaping and park equipment.
4. Administrative activities described below:
- a. Mortgage financing assistance;
 - b. Purchase of equipment, etc., where any associated physical improvements are on the exempt activities list;
 - c. Administrative costs; and
 - d. Building acquisition, where any associated physical improvements are on the exempt activities list.

During 2002, the State Historical Society of Iowa announced that the 100 Block of West Broadway would be placed on the National Register of Historic Places. It is because of this designation that in 2005 the Historic Preservation Rehabilitation Program was established to assist and encourage the private sector to reinvest in the area. Any and all exterior modifications to the commercial and/or mixed use properties in the district must be reviewed by the Historic Preservation Commission to ensure that the proposed changes are consistent with the Secretary of Interior's Standards for Rehabilitation and any federally funded project which may have potential effects on the properties must comply with Section 106 of the National Preservation Act of 1966.

In addition, during 2003 a private consultant was hired to conduct an intensive level survey of a portion of 3rd Street, Bluff and Willow Avenue in order to evaluate the district's potential eligibility for nomination to the National Register of Historic Places. The goal is to establish the first Residential Historic District in Council Bluffs. Significant neighborhood interest has been instrumental in the development of this district. Other neighborhood interest has been generated in the Oakland Avenue area. It is anticipated that renewed interest in preservation activities will influence future programmatic and financial decisions. The City is exploring the development of design guidelines for redevelopment efforts in the historic districts.

New for the 2005 program year is the Historic Preservation Rehabilitation Program, which is intended to assist with the establishment of revolving loans and/or grants to be used to aid private owners of historically designated properties in the downtown area with necessary improvements

and renovation resulting in reuse of the buildings for commercial and/or mixed use. Properties that are strictly residential in nature would not be eligible for funding. The program is intended to assist in the revitalization and reinvestment of the downtown area, leading to more private sector investment and increasing the number of residential units in downtown. \$300,000 in Economic Development Initiative funds and \$500,000 in private foundation funds are being allocated for this Program.

Proposed Use of Funds

The following section presents the City's proposed use of CDBG funds for 2005. Our proposed program places a high priority on housing development, creation of affordable housing opportunities, blight removal, economic development, assistance to homeless families and individuals – with an emphasis on benefits to low and moderate income people.